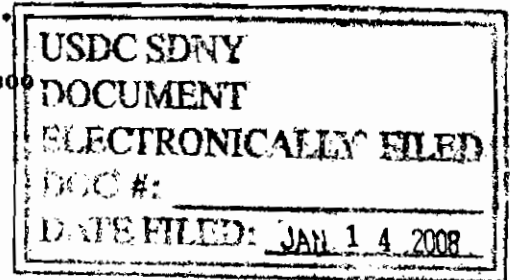


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(914) 997-0100
FAX (914) 997-4179



ANTHONY J. SIANO

January 10, 2008

By facsimile to 212-805-0426

Honorable Laura T. Swain, U.S.D.J.
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street, Room 775
New York, New York 10007

IT IS ORDERED that counsel to whom this Memo is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel to the represented parties and filing a certificate of service within 5 days from the date hereof. Do not attach certification to Chambers.

Re: National Union Fire Insurance Company of Pittsburgh v. Chen,
07 CIV 6715 (LTS)(HBP)

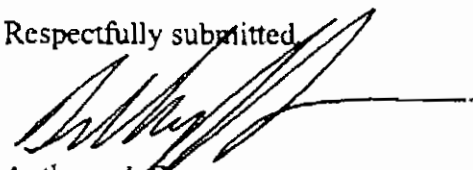
Dear Judge Swain:

I am counsel for the defendant in the above captioned civil action.

With the consent of counsel for the plaintiff, I write to ask for an extension of time to submit the "Joint Preliminary Pre-trial Statement" required by Your Honor's rules. The reason for my request is that my client, the sole defendant in the action, is incarcerated pursuant to a federal sentence. Although a draft Preliminary Statement has been prepared by plaintiff's counsel, I need additional time to review that draft with my client and to find and examine records, which are not available to my client directly due to his incarceration.

The parties jointly propose a new submission date of February 29, 2008 and a new pre-trial conference date of March 7, 2008.

Respectfully submitted



Anthony J. Siano

cc: Joseph W. Szalyga, Esq. (by facsimile and mail)
Clausen Miller, P.C.
Counsel for Plaintiff

The requests are granted.
The conference will be held on
March 7, 2008, at 10:00 AM.
SO ORDERED.

Copies mailed/faxed to
Chambers of Judge Swain

Def't's Counsel
1-14-08


LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

01/10/2008 15:56 FAX